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Counsel for MICHAEL SINGLETARY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

MICHAEL SINGLETARY,
Defendant.

) CR-12-798 YGR

)
) STIPULATION TO CONTINUE
) STATUS HEARING AND EXCLUDE
) TIME; ~~PROPOSED~~ ORDER
) THEREON

The parties stipulate as follows:

1. The case is currently set for a status hearing on September 19, 2013.
2. The Superseding Indictment was filed on May 7, 2013, and includes a new charge for obstruction of justice. At the parties last status conference, we anticipated resolving discovery issues and being prepared to set motions dates on September 19, 2013.
3. The defense is continuing with its investigation, which is not yet completed due to delays in obtaining public records, which have been requested but not yet produced. The defense has also requested additional discovery that the parties are working on in good faith.
4. The parties request that the Court continue the case from September 19, 2013 to October 3, 2013 to allow for defense preparation and investigation. On October 3, 2013, the parties will be prepared to resolve the case or set motions dates.

1 5. The parties agree that an exclusion of time under the speedy trial act is necessary
2 for the effective preparation of the defense, and in the interests of justice.

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4 DATED: September 10, 2013

/s/ James Mann
James Mann , Esq.
Attorney for Plaintiff
UNITED STATES

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7 DATED: September 10, 2013

/s/ Kenneth Wine
Kenneth H. Wine, Esq.
Attorney for Defendant
MICHAEL SINGLETARY

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11 **ORDER**

12 FOR GOOD CAUSE SHOWN,

13 It is hereby ordered that:

14 Based upon the representation of counsel and for good cause shown, the Court finds that
15 failing to exclude time between September 19, 2013 and October 3, 2013 would unreasonably deny the
16 defendants the reasonable time necessary for effective preparation, taking into account the exercise of
17 due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The court further finds that the ends of justice served by
18 excluding the time between September 19, 2013 and October 3, 2013 from computation under the
19 Speedy Trial Act outweighs the best interests of the defendant in a speedy trial. Therefore, IT IS
20 HEREBY ORDERED that the time between September 19, 2013 and October 3, 2013 shall be excluded
21 from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

22 The case is set for a status hearing at 2:00 p.m. on October 3, 2013.

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25 DATED: September 17, 2013


HON. YVONNE GONZALEZ ROGERS
U.S. DISTRICT COURT